

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X	:	
ROBERT L. GARBER, Derivatively on Behalf	:	
of LEHMAN BROTHERS HOLDINGS, INC.,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Case No.: 07-CV-02990 (DAB/HBP)
	:	
RICHARD S. FULD, JR., MICHAEL L.	:	
AINSLIE, JOHN F. AKERS, ROGER S.	:	
BERLIND, THOMAS H. CRUIKSHANK,	:	
MARSHA JOHNSON EVANS, SIR	:	
CHRISTOPHER GENT, JOHN L. CECIL,	:	
ROLAND A. HERNANDEZ, JOHN D.	:	
MACOMBER, DINA MERRILL, JONATHAN	:	
BEYMAN, DAVID GOLDFARB, JOSEPH M.	:	
GREGORY, JEREMY M. ISAACS,	:	
CHRISTOPHER O'MEARA, THOMAS A.	:	
RUSSO, BRADLEY H. JACK, HENRY	:	
KAUFMAN, STEPHEN M. LESSING,	:	
MICHAEL F. MCKEEVER, JEFFREY	:	
VANDERBEEK,	:	
	:	
Defendants,	:	
	:	
- and -	:	
	:	
LEHMAN BROTHERS HOLDINGS, INC.,	:	
	:	
Nominal Defendant.	:	
-----X	:	

**DISCLOSURE STATEMENT PURSUANT TO
FEDERAL RULE OF CIVIL PROCEDURE 7.1**

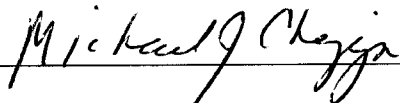
Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure, the undersigned counsel of record for Nominal Defendant Lehman Brothers Holdings, Inc. ("Lehman") certifies as follows:

1. Lehman does not have a parent company.

2. No publicly-held corporation directly or indirectly controls 10% or more of Lehman's stock.

Dated: May 1, 2007

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Lehman Brothers Holdings, Inc.*